

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

JAMES W. DABNEY,

Petitioner,

v.

HUGHES HUBBARD & REED LLP,

Respondent.

1:23-mc-78-MKV

**ECF CASE**

**DECLARATION OF MICHAEL E.  
SALZMAN IN SUPPORT OF  
RESPONDENT'S OPPOSITION TO  
CLAIMANT'S PETITION FOR AN  
ORDER TO SHOW CAUSE IN AID  
OF ARBITRATION**

Michael E. Salzman declares, pursuant to 28 U.S.C. § 1746, under penalty of perjury, that the following is true and correct:

1. I am the General Counsel of Hughes Hubbard & Reed LLP ("HHR" or the "Firm"), and a member of the Bar of this Court. I am fully familiar with all the facts stated herein and make this Declaration on personal knowledge.

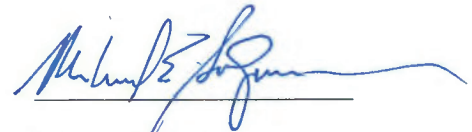
2. I submit this Declaration in support of Respondent's Opposition to Claimant's Petition for an Order to Show Cause in Aid of Arbitration.

3. On the evening of Monday, February 6, 2023 I accessed the Partner Information Page of the Firm's intranet, Hugheshub, printed out Policy Memorandum No. 3 and then scanned it to Anne L. Clark, counsel for Petitioner. A true and correct copy of that document, including the two-page addendum describing the role of Senior Counsel, is attached as Exhibit 2 to the

Declaration of Theodore V.H. Mayer dated April 10, 2023 submitted in Support of Respondent's Opposition to Claimant's Petition for an Order to Show Case in Aid of Arbitration.

4. I have checked the document history of the Firm's Policy Memorandum No. 3's presence on the Firm's Partner Information Page and confirm that the Policy Memorandum No. 3 that I sent to Ms. Clark was available on the Partner Information Page on October 21, 2021, the date when Petitioner Dabney contends he downloaded Policy Memorandum No. 3 but without the two-page Senior Counsel addendum.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 10th day of May, 2023 in New York, New York.

A handwritten signature in blue ink, appearing to read "Michael E. Salzman", written over a horizontal line.

Michael E. Salzman